

1 PAUL W. BLAKE  
2 Attorney at Law  
3 State Bar #94963  
4 4045 Bonita Road, Suite 202  
5 Bonita, California 91902  
6 (619) 908-6429/FAX (619) 578-2805

7  
8 Attorney for Defendant MAGGIE SIEBEN  
9

10  
11  
12  
13  
14  
15  
16  
**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HON. ROGER BENITEZ)**

17 UNITED STATES OF AMERICA, ) Case No. 08-CR-0511-4-BEN  
18 Plaintiff, )  
19 v. )  
20 MAGGIE SIEBEN, )  
21 Defendant. )  
22 \_\_\_\_\_ )  
23 ) NOTICE OF MOTION AND MOTION  
24 ) FOR DISCOVERY; TO DECLARE  
25 ) CASE COMPLEX; AND FOR LEAVE  
26 ) TO JOIN MOTIONS FILED BY  
27 ) OTHER COUNSEL; AND FOR  
28 ) LEAVE TO FILE FURTHER  
MOTIONS

DATE:  
TIME:  
DEPT:

TO: PLAINTIFF UNITED STATES OF AMERICA AND ITS ATTORNEY OF  
RECORD, KAREN P. HEWITT, UNITED STATES ATTORNEY FOR THE SOUTHERN  
DISTRICT OF CALIFORNIA; AND ASSISTANT U.S. ATTORNEY TIMOTHY F.  
SALEL.

Please take notice that at the above designated time and place, defendant Maggie Sieben will move the court for an order compelling discovery in the instant case with respect to the items set forth in the attached memorandum of law, based upon the constitutional, statutory, and judicial authorities cited herein. Defense counsel will further move the court to have case declared complex and for leave to join the motions filed in this matter by other counsel unless specifically exempted therefrom, and for leave to file further motions.

27     ///  
28     ///

Said motion is based upon the instant notice of motion, the attached memorandum of law, and on such evidence and argument as may be presented at the hearing on the motion.

Date: April 7, 2008

Respectfully submitted,

/s/ Paul W. Blake  
PAUL W. BLAKE  
Attorney for Defendant MAGGIE SIEBEN  
4045 Bonita Road, Suite 202  
Bonita, California 91902  
(619) 908-6429 (tel)  
(619) 578-2805 (fax)  
[paulwblake@cox.net](mailto:paulwblake@cox.net)

1:\Blake\Sieben.MFDisc-Join-Not